



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

NOV 13 2001

Mr. Kent Myers  
Vice President of Operations  
Williams Field Services  
P.O. Box 645  
Williams One  
Tulsa, OK 74101

RE: CPF No. 4-2001-1002

Dear Mr. Myers:

Enclosed is a Final Order issued by the Associate Administrator for Pipeline Safety in the above-referenced case. It makes findings of violations of pipeline safety standards. Your receipt of the Final Order constitutes service of that document under 49 C.F.R. §190.5.

I acknowledge receipt of, and accept your wire transfer dated August 23, 2001, in the amount of \$196,500 as payment in full of the civil penalty. This case is now closed and no further enforcement action is contemplated with the respect to the matters involved in this case. Thank you for your cooperation in our joint effort to ensure pipeline safety.

Sincerely,

Gwendolyn M. Hill  
Pipeline Compliance Registry  
Office of Pipeline Safety

Enclosure

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEPARTMENT OF TRANSPORTATION  
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION  
OFFICE OF PIPELINE SAFETY  
WASHINGTON, DC 20590

\_\_\_\_\_  
In the Matter of )  
 )  
 )

Williams Field Services, )

CPF No. 4-2001-1002

Respondent. )  
\_\_\_\_\_)

FINAL ORDER

Between September 10, 2000 and October 20, 2000, pursuant to Chapter 601 of 49 United States Code, a representative of the Office of Pipeline Safety (OPS) conducted an inspection of the Williams Field Services natural gas onshore and offshore pipeline systems located in Schriever, Kaplan, South Texas North/Markham, South Texas South, Schriever Offshore, Johnson's Bayou/Kaplan Offshore, and South Texas Offshore. These systems are located in Texas, Louisiana and Offshore. As a result of the inspection, the Director, Southwest Region, OPS, issued to Respondent, by letter dated July 19, 2001, a Notice of Probable Violation and Proposed Civil Penalty (Notice). In accordance with 49 C.F.R. § 190.207, the Notice proposed finding that Respondent had committed violations of 49 C.F.R. Part 192 and proposed assessing a civil penalty of \$196,500 for the alleged violations.

FINDINGS OF VIOLATION

Respondent did not contest alleged violations of 49 C.F.R. Part 192 in the Notice. Accordingly, I find that Respondent violated the following sections of Part 192, as more fully described in the Notice:

49 C.F.R. § 192.201-- failure to set a relief device properly to insure that the pipeline's pressure did not exceed the maximum allowable pressure plus 10 percent;

49 C.F.R. § 192.465(d)-- failure to take immediate action to correct cathodic protection deficiencies indicated by monitoring;

49 C.F.R. § 192.481-- failure to conduct three year interval onshore atmospheric corrosion survey. The operator exceeded the required three year inspection interval by approximately 425 days (South Texas South) and 234 days (South Texas North/Markham);

49 C.F.R. § 192.603(b)-- failure to maintain documentation to indicate that public officials were contacted regarding operator's operations, maintenance, and emergency response procedures (Schriever). Also failure to provide documentation that a continuing education program was conducted (South Texas North/Markham, South Texas South);

49 C.F.R. § 192.614(c)(2)-- failure to follow-up with information to excavators that work in the area near the pipeline to ensure that they receive damage prevention information;

49 C.F.R. § 192.705-- failure to patrol transmission lines to observe the surface conditions for indications of leaks, construction activity and other factors affecting safety and operation;

49 C.F.R. § 192.706-- failure to conduct leakage surveys of the transmission line once each calendar year at intervals not exceeding 15 months;

49 C.F.R. § 192.739-- failure to inspect and test each pressure limiting station, relief device and pressure regulating station and its equipment once each calendar year at intervals not exceeding 15 months; and

49 C.F.R. § 192.745-- failure to inspect and partially operate each transmission line valve that might be required during any emergency once each calendar year at intervals not exceeding 15 months.

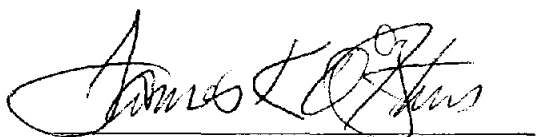
These findings of violation will be considered as prior offenses in any subsequent enforcement action taken against Respondent.

#### ASSESSMENT OF PENALTY

Under 49 U.S.C. § 60122, Respondent is subject to a civil penalty not to exceed \$25,000 per violation for each day of the violation up to a maximum of \$500,000 for any related series of violations.

49 U.S.C. § 60122 and 49 C.F.R. § 190.225 require that, in determining the amount of the civil penalty, I consider the following criteria: nature, circumstances, and gravity of the violation, degree of Respondent's culpability, history of Respondent's prior offenses, Respondent's ability to pay the penalty, good faith by Respondent in attempting to achieve compliance, the effect on Respondent's ability to continue in business, and such other matters as justice may require.

Taking the above factors into consideration, I assess a civil penalty in the amount of \$196,500, already paid by Respondent. The terms and conditions of this Final Order are effective upon receipt.



Stacey Gerard  
Associate Administrator  
for Pipeline Safety

NOV 13 2003

Date Issued